

# Exhibit B

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

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**CHRISTOPHER GODSON,  
on behalf of himself  
and all others similarly situated**  
**Plaintiffs,**

**vs.**

**Civil Action No. 11-CV-764**

**ELTMAN, ELTMAN & COOPER, P.C., and  
LVNV FUNDING, LLC,**

**CLASS ACTION**

**Defendants.**

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**TIME RECORDS FOR SETH J. ANDREWS**

Time Entry  
Christopher Godson v. Eltman, Eltman & Cooper et al.  
Index No. 11-CV-764

<b>DATE</b>	<b>ACTIVITY</b>	<b>TIME</b>
11/9/11	Rec'd corr from Opp regarding extension for time to File answer; drafted corr in response to request for extension	.2
11/10/11	Review stipulation to ext Def time to answer	.1
11/15/11	Tcw opp re: Def inquiry early settlement, case posture	.2
12/12/11	Rec'd corr from opp re: inquiry to settle. Review Def Answer. Telephone conf w/ client re: status update	.4
1/2/12	Tcw client re: status update- motion to strike answer	.3
1/17/12	Drafted corr to opp re: proposed CMO and selection of mediator	.2
1/27/12	Rec'd corr from opp re: proposed CMO	.1
1/30/12	Rec'd corr from opp re: edit to CMO. Drafted response	.1

<b>DATE</b>	<b>ACTIVITY</b>	<b>TIME</b>
1/31/12	Rec'd corr from opp re: filing of CMO. Drafted response	.1
2/17/12	Reviewed Def 26a1 disclosures	.2
3/28/12	Mediation prep with client and BB	1.0
3/30/12	Attend mediation with client	8.0 +5
3/25/12	Tcw client re: status update for motion to certify class	.2
5/17/12	Mediation prep w/ client for follow up session	1.0
5/18/12	Attend follow up mediation	8.0 +5
6/13/12	Telephone call w/ BB re issues concerning First Set of Written Discovery Demands	.2
7/3/12	Rec'd corr from op re: discovery schedule relative to class cert Motion	.1
7/5/12	Rec'd corr from opp re: scheduling Plaintiff's deposition	.1
7/5/18	Tcw co-counsel, BB, re: dates for Plaintiff's deposition	.2
7/5/18	Tcw client re: scheduling Plaintiff deposition	.2
7/6/12	Review opp motion to stay briefing on class cert motion and to Seek limited discovery	.2
7/9/12	Deposition prep w/ client, BB	2.0
7/17/12	Rec'd and reviewed Def response to discovery demands	.3
7/18/12	Defend Plaintiff's deposition	2.0
7/24/12	Rec'd and review Plaintiff's deposition transcript	.5
8/13/12	Tcw co-counsel, BB, re: opposition to class cert motion	.7
8/29/12	Drafted Aff in support of Plaintiff's Reply for Motion for Class Counsel and to certify the class	.6

9/11/12	Rec'd Reviewed Ct Order granting motion to strike; Tcw Client re: status update	.3
9/25/12	Rec'd reviewed Def amended ans. Tcw client re: status report and Motion to compel	.2

DATE	ACTIVITY	TIME
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10/29/12	Rec'd corr from opp re: request for ext to opp motion to compel. Rec'd amd reviewed Defendant's discovery demands	.3
11/7/12	Rec'd corr from opp re: response to vm requesting consent for modification scheduling order for discovery deadline Drafted motion to amend scheduling order and w/ aff	.5
11/27/12	Drafted responses to Def discovery demands; met w/ client to Review and confirm responses.	2.0
4/4/13	Tcw client re: status update	.2
8/23/13	Tcw client re: status update	.2
9/11/13	Rec'd review Ct Order granting motion to compel. Tcw client Re: status update	.2
10-5-13	Tcw re: motion for sanctions	.3
10-18-13	Rec'd and review Def LVNV SJM; tcw client re: status update	.3
12-9-13	Tcw client re: status update for motion to ext deadline to complete discovery	.2
1-10-14	Tcw client re: status update for 2 <sup>nd</sup> motion to compel and for sanctions	.2
2-7-14	Rec'd and Review Def motion to bifurcate	.2
5-14-14	Tcw client re: status update re: pending motions	.1
9-15-14	Rec'd & review Ct order denying and granting sanctions, granting Ext for discovery deadline, granting and denying motion to compel Denying motion to bifurcate.	.2
9-16-14	Tcw client re: status update for Ct order for 9-15-14	.4

<b>DATE</b>	<b>ACTIVITY</b>	<b>TIME</b>
10-10-14	Tcw w/ client re: motion for reconsideration for motions relative to 9-15-14 order	.2
10-24-14	Tcw client re: status update for 3 <sup>rd</sup> motion for sanctions	.1
4-1-15	Tcw client re: status of pending motions	.2
8-2-15	Tcw client re: status of pending motions	.2
9-30-15	Rec'd and review Ct order granting and denying motion for Sanctions and reconsideration	.2
10-2-15	Tcw client re: status update for 9-30-15 Ct oder	.2
10-9-15	Tcw co-counsel BB, JRM re case status & settlement	.5
10-30-15	Tcw client re: status update for def motion to ext to complete Discovery	.1
11-13-15	Drfated motion to ext Plaintiff deadline for fee petition	.3
12-22-15	Rec'd and reviewed ct order affirming magistrate order of 9-30-15	.1
12-28-15	Tcw client re: status update for Ct order of 12-22-15	.2
2-1-16	Tcw client re: status update for 4 <sup>th</sup> motion for sanctions	.1
4-15-16	Rec'd reviewed Ct order granting and denying 4 <sup>th</sup> motion Sanctions	.1
4-18-16	Tcw client re: status update for Ct order 4-15-16	.2
5-26-16	Tcw client re: status update for 5 <sup>th</sup> motion for sanctions	.1
10-3-16	Tcw client re: status of pending sanction and protective order Motions	.1
1-8-17	Tcw co-counsel BB, JM re: discovery/deposition	.4
1-9-17	Rec'd and review ct oRder granting def motion for protective order And denying 5 <sup>th</sup> motion for sanctions	.1
1-10-17	Tcw client re: status update for 1-9-17 Ct order	.1

<b>DATE</b>	<b>ACTIVITY</b>	<b>TIME</b>
5-29-17	Tcw client re: status update for motion for discovery ext	.1
10-13-17	Tcw client re: Ct ordered mediation 11-7-17	.3
11-1-17	Drafted mediation memo for mediator	2.0
11-6-17	Mediation prep w/ client & BB	1.0
11-7-17	Attended Ct ordered mediation	7.0
4-2-18	Drafted aff in support of jt motion for prelim class approval Settlement and appointment of counsel	.5
5-21-18	Tcw client re: Ct order granting approval class settlement	.2
		Total-47.6

47.6 Hours Total for Seth J. Andrews (SJA)

x \$300/hr

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\$14,280.00